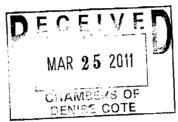
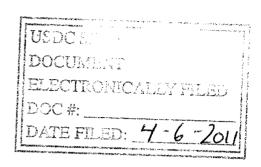
THOMAS T. PROUSALIS, JR.

March 23, 2011





VIA U.S. MAIL AND E-MAIL

Hon. Denise L. Cote
U.S. District Court
for the Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007 – 1312

MEMO ENDORSED

Re: Request for Reconsideration

United States v. Thomas T. Prousalis, Jr., S1 03 Cr 1509 (DLC)

Dear Judge Cote:

On March 21, 2011, the Court *denied* my pending foreign travel request for business and family purposes. However, the Court ruled without the benefit of my Reply to the Government's Response to Pending Request to Travel Abroad, filed with the Court on March 22, 2011, and my Supplement to Reply to the Government's Response to Pending Request, filed with the Court on March 23, 2011. Edward M. Kratt, Esq. and I received the Government's response, filed with the Court on March 17, 2011, *via* Fedex on March 21, 2011, even though the Government has our e-mail addresses. We believe that the Government's delay in providing us with a timely response prejudiced the Court's ability to consider all of the facts in this matter, as outlined in my reply and supplement, and we respectfully ask the Court to reconsider its decision.

Also, enclosed is a copy of my amended Travel Request Form filed this date with Senior U.S. Probation Officer Charles E. Moore by way of this letter. Briefly, the travel request pertains to travel to Struga, Macedonia, over the Easter holiday in order for my father to join me in meeting my fiancée-to-be and her family, including her aunts and uncles, and her grandparents, which is an important Eastern Orthodox custom prior to an engagement, and to celebrate Easter together. This is strictly a family matter and no business will be conducted during the visit. Mr. Moore will be able to have 24/7 contact with me (and my father) via telephone, SMS and e-mail during the visit. This Easter visit has been in the planning stages for a year, and it is very important to us and our families.

Thank you for your reconsideration.

foreign Francis is climical.

Menine lote

A pril 6, 2011

Sincerely

Thomas T. Prousalis, Jr.

TTP

cc: Abigail S. Kurland, Esquire Assistant U.S. Attorney One St. Andrews Plaza New York, New York 10007 abigail.kurland@usdoj.gov (212) 637-2396

> Edward M. Kratt, Esquire 350 Broadway, Suite 1202 New York, New York 10013 edkratt@aol.com (212) 941-1277

Mr. Charles E. Moore Senior U.S. Probation Officer 701 East Broad Street Richmond, Virginia 23219 <u>charles_moore@vaep.uscourts.gov</u> (804) 916-2543

Thomas T. Prousalis, Sr. 10501 S. Falconbridge Court Richmond, Virginia 23233 TTPSr@comcast.net (804) 740-1188

UNITED STATES PROBATION OFFICE EASTERN DISTRICT OF VIRGINIA

TRAVEL REQUEST FORM (AMENDED)

Senior U.S. Probation Officer Charles E. Moore

Name: Thomas T. Prousalis, Jr.

Address: 10501 S. Falconbridge Court, Richmond, Virginia 23233

Phone Number, SMS and e-Mail: (202) 701-9016 / N1TP@msn.com

Destination: IAD – SKP – IAD

Departure and Return Date: April 19 – May 4, 2011

Purpose of Trip: Family

Persons Traveling With: Thomas T. Prousalis, Sr. (Father)

Cost of Trip: Complimentary (UA)

Source of Funds: n/a

Accommodations:

Name: Hotel Inex Drim (Struga, Macedonia)

Mode of Transportation:

Vehicle: Taxis

Make and Model: n/a

Name of Airline: United Airlines / Austrian Airlines

Itinerary:

IAD-ZRH-IAD (04.19.11 UA936 1750 - 0805 / 05.04.11 UA937 1155 - 1508)

 $ZRH-SKP-ZRH \quad (04.20.11\ \ OS568/779\ \ \ 0750-1135\ /\ \ 05.04.11\ \ \ OS776/561\ \ 0430-0845)$

Other Mode of Transportation: Taxis

COPIES SENT TO

Abigail Kurland Assistant United States Attorney One Saint Andrew's Plaza New York, NY 10007

Edward M. Kratt Attorney At Law 350 Broadway, Suite 1202 New York, NY 10013

Thomas T. Prousalis, Jr. 10501 S. Falconbridge Court Richmond, VA 23233

U.S. Probation Department Attn: Giavonnii A. Foderingham